## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case: 1:19-cr-20014

Judge: Ludington, Thomas L.

MJ: Morris, Patricia T.

Filed: 01-9-2019

SEALED MATTER (krc)

SETH RYAN MOSE,

V.

Defendant.

### **INDICTMENT**

### THE GRAND JURY CHARGES:

# COUNT ONE (18 U.S.C. §§ 2252A(a)(2) and (b)(1)) (Distribution and Receipt of Child Pornography)

Between on or about February 2, 2018, and on or about June 12, 2018, in the Eastern District of Michigan, Northern Division, the defendant SETH RYAN MOSE knowingly distributed and received child pornography and material that contained child pornography, as defined in Title 18, United States Code Section 2256, that had been mailed, or shipped or transported using any means and facility of interstate or foreign commerce or in and affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18 United States Code, Sections 2252A(a)(2) and (b)(1).

## **COUNT TWO**

(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))

(Possession of Child Pornography Involving a Prepubescent Minor or a Minor Who Had Not Attained 12 Years of Age)

Between on or about November 23, 2017, and on or about August 10, 2018, in the Eastern District of Michigan, Northern Division, the defendant SETH RYAN MOSE knowingly possessed material that contained images of child pornography, as defined in Title 18, United States Code Section 2256, which involved a prepubescent minor or a minor who had not attained 12 years of age, and which had been mailed, or shipped or transported using any means or facility of interstate or foreign commerce, or in and affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18 United States Code, Sections 2252A(a)(5)(B) and (b)(2).

# <u>COUNT THREE</u> (18 U.S.C. §§ 2422A(b) and 2)

(Coercion and Enticement of a Minor)

In or about September 2014, the exact date or dates being unknown to the Grand Jury, in the Eastern District of Michigan, the defendant SETH RYAN MOSE used any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce, and to knowingly attempt to persuade, induce, entice and coerce, any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, that is, Rape, in

violation of Ohio Revised Code § 2907.02(A)(1)(b), in violation of Title 18, United States Code Sections 2422(b) and 2.

### FORFEITURE ALLEGATIONS

Pursuant to Fed. R. Crim. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or any property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; and all property involved in, or property traceable to, any of the violations set forth in this indictment, including one Apple iPhone, Model A1661, Serial # FCJ30BAHFXW, one Toshiba laptop, Serial # 6E312867P, with a 750 GB hard drive, and one Western digital 320 GB hard drive, Model WD3200BEK, Serial # WX90A99N9123.

Dated: January 9, 2019

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER United States Attorney

s/Anca I. Pop ANCA I. POP (P70032) Assistant United States Attorney 101 First Street, Suite 200 Bay City, MI 48708 Telephone number: (989) 895-5712

email: anca.pop@usdoj.gov

s/Anthony P. Vance
ANTHONY P. VANCE (P61148)
Assistant United States Attorney
Chief, Branch Offices

Companion Case information MUS	T be completed by AUSA and initi	aled
United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
NOTE: It is the responsibility of the Assistant U.S. A	ttorney signing this form to complete it accurately	in all respects.
Companion Case Information	Case: 1:19-cr	-20014
This may be a companion case based upon	Judge: Luding	gton, Thomas L.
□ Yes □ No	Filed: 01-9-20 SEALED MA	019
Case Title: USA v. SETH RY	AN MOSE	
County where offense occur	red:	
Check One: X Felony □	Misdemeanor □ Petty	
X Indictment/Information no prior complaint. Indictment/Information based upon prior complaint [Case number:] Indictment/Information based upon LCrR 57.10 (d) [Complete Superseding section below].		
Superseding Case Information	9 D D	
Superseding to Case No:	Judge:	
### #################################	nal charges or defendants. s, different charges or adds counts. atter but adds the additional defendants	s or charges below:
<u>Defendant name</u>	Charges	Prior Complaint (if applicable)
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Please take notice that the below lise he above captioned case.	sted Assistant United States Attor	ney is the attorney of record for
no above capacinea case.	The	
ate: January 9, 2019	Anca I. Pop	
	Assistant United States Att	
	Phone: 989-895-5712	Day City, IVII 40700
	101 First Street, Suite 200,	

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.

E-Mail address: anca.pop@usdoj.gov Attorney Bar #: P-70032